

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

SCOTT TURNAGE , CORTEZ D.
BROWN, DEONTAE TATE, JEREMY S.
MELTON, ISSACCA POWELL, KEITH BURGESS,
TRAVIS BOYD, TERRENCE DRAIN, and
KIMBERLY ALLEN on
behalf of themselves and all similarly
situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity and in his
official capacity as the Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual
capacity and in his official capacity as the Jail Director
of Shelby County, Tennessee; CHARLENE
MCGHEE, in her individual capacity and in her
official capacity as the Assistant Chief of Jail Security
of Shelby County, Tennessee; DEBRA HAMMONS,
in her individual capacity and in her official capacity
as the Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY,
TENNESSEE, a Tennessee municipality; and TYLER
TECHNOLOGIES, INC., a foreign corporation,

Defendants.

**Civil Action No. 2:16-cv-02907-SHM-
tmp**

(Hon. Judge Samuel H. Mays)

**PARTIES' JOINT MOTION AND MEMORANDUM REQUESTING APPROVAL OF
PROPOSED SCHEDULING ORDER**

The Parties file this Joint Motion and Memorandum Requesting Approval of the
Proposed Scheduling Order, stating:

1. The Court held a Scheduling Conference in this matter on February 22, 2017.
(D.E. 36)
2. During the Scheduling Conference, the Parties orally moved the Court to
bifurcate class certification from merits discovery and the Court agreed.

3. On February 23, 2017, the Court entered a Scheduling Order. (D.E. 37)
4. The Court provided dates pursuant to the Parties' oral motion regarding class certification issues.
5. After a series of motions and the filing of the Third Amended Class Action Complaint (D.E. 103), the dates in the Scheduling Order are no longer valid.
6. The Parties propose a new Scheduling Order in this matter. The proposed Scheduling Order is attached hereto as Exhibit A.
7. The times in the proposed Scheduling Order are longer than the times in the prior Scheduling Order. Class Counsel for the plaintiffs are involved in an extended trial and requested additional time in the proposed Scheduling Order. The Defendants do not object to the additional time.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court approved the proposed Scheduling Order.

Respectfully submitted,

/s/ Odell Horton, Jr.

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CERTIFICATE OF CONSULTATION

On August 29 and 30, 2018, counsel for the parties conferred via e-mail and telephone regarding the Proposed Scheduling Order. The Parties agree to this proposed Scheduling Order.

/s/ Odell Horton, Jr.

CERTIFICATE OF SERVICE

The undersigned certifies that on September 6, 2018, a true and correct copy of the foregoing has been served upon the following counsel, via the Court's ECF filing system:

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